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MAY 20 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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May 14, 1993

Federal Communications Commission
Office of the Secretary
Washington, DC. 20554

Reference: Docket 92-235/N.P.R.M.

Gentlemen:

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I am writing in several capacities: First, I have held a first class radio telephone license and have been active in the two-way radio business for the past 36 years; Second, as an elected official of Bandera County and my concern for the cost of implementation and severe problems if 92-235 is implemented as proposed. And, third, as a concerned tax payer I am skeptical of the motives of the radio industry giants.

The Bandera County Sheriff's Department purchased a \$200,000.00 "State of the Art" replacement radio system in 1990. This equipment (VHF, 150 MHz) is rated for 25kHz channel spacing. Yet the frequency coordinator allowed Kendall County, about 15 miles airline from our site, to license and install a base station operating only 15kHz from our repeater input frequency. Needless to say, every time they key their transmitter, our receiver limiter is saturated. The manufacturer states we can do nothing. They say installation of a narrow band I.F. filter will inhibit the digital capabilities of the station. In short, we are faced with 1996 problems proposed by docket 92-235 TODAY. That same frequency coordinator in 1988 placed the Guadalupe County Sheriff's Office repeater output on our repeater input frequency. Initially, they caused interference during peak propagation conditions. (They are located 70 miles airline from our site.) We objected in 1988 to the frequency coordinator and about two years ago Guadalupe County was allowed to increase their effective antenna height 200 feet. Now they interfere with our mobile units to the extent that our sheriff considers it a threat to life for the deputies and for the emergency response personnel. Portable (handheld) operation is impossible. My point is this: First, I see many small towns just a few miles across with repeaters running 100 watts and coverage far in excess of their needs; Second, speaking from my limited experience with our frequency coordinator, it seems to

should be exceptions to this proposed rule for local government systems covering large geographical areas (on a case by case basis).

I am skeptical of the reasons why the new proposals (channel spacing and power restrictions) apply to VHF and UHF only. Since the same technology can be applied to 800 MHz, why is there no requirement for implementation of the new efficiencies of spectrum use on 800 MHz at some future time? Is it because the equipment is so new?

In the past 40 odd years I have observed a continuous degradation of the quality and content of communications on public safety two-way radio systems. There is, in some cases, a total lack of operator discipline and it appears to me there is less input to management from technical personnel and more from sales personnel regarding system needs. I am concerned that the public safety two-way radio systems will follow in the foot steps of the 27MHz citizens band. When regulation gets out of hand, just turn the users loose. While recognizing the spectrum is crowded, it is not responsible in our economic times to implement new regulations without regard to the potential cost of the new technology and equipment.

I sincerely appreciate this opportunity to comment on this N.P.R.M. and I hope you will give consideration to the needs of the small community with limited resources. Just remember, you may some day be in Bandera County and require emergency services.

Sincerely,

Ernest C. Reich, III